

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: E. I. DU PONT DE NEMOURS AND
COMPANY C-8 PERSONAL INJURY
LITIGATION

CASE NO. 2:13-MD-2433

JUDGE EDMUND A. SARGUS, JR.

This document relates to:

MAGISTRATE JUDGE ELIZABETH P.
DEAVERS

*Bartlett v. E. I. du Pont de Nemours and
Company, No. 2:13-CV-170*

DUPONT'S PROPOSED VERDICT FORM

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VERDICT FORM

**WE THE JURY, BEING DULY IMPANELED, DO HEREBY FIND AS FOLLOWS ON
THE CLAIMS BROUGHT BY CARLA BARTLETT AGAINST E. I. DU PONT DE
NEMOURS AND COMPANY:**

**1. Has Carla Bartlett proved by a preponderance of the evidence every element of her
claim of negligence?**

ANSWER (circle one in ink)

YES

NO

1. _____

5. _____

2. _____

6. _____

3. _____

7. _____

4. _____

2. Has Carla Bartlett proved by a preponderance of the evidence every element of her battery claim?

ANSWER (circle one in ink)

YES

NO

1. _____

5. _____

2. _____

6. _____

3. _____

7. _____

4. _____

3. Has Carla Bartlett proved by a preponderance of the evidence every element of her claim of negligent infliction of serious emotional distress?

ANSWER (circle one in ink)

YES

NO

1. _____

5. _____

2. _____

6. _____

3. _____

7. _____

4. _____

If you answered "YES" to question 1, 2, or 3 (above), please answer Question No. 4. If you answered "NO" to questions 1, 2, and 3 (above), do not answer Question No. 4 or Question No. 5.

4. What sum of money has Carla Bartlett proven by a preponderance of the evidence would fairly and reasonably compensate her for the injuries she suffered as a proximate result of DuPont's conduct?

\$ _____**

***insert in ink either "NONE" or the dollar amount*

- | | |
|----------|----------|
| 1. _____ | 5. _____ |
| 2. _____ | 6. _____ |
| 3. _____ | 7. _____ |
| 4. _____ | |

If you awarded any amount of monetary damages in Question No. 4, please answer Question No. 5.
If you awarded no damages in Question No. 4, then do not answer Question No. 5.

5. Do you find that Carla Bartlett proved by clear and convincing evidence that the conduct of DuPont that caused her injury was done with a conscious disregard for the rights and safety of another person that had a great probability of causing substantial harm?

ANSWER (circle one in ink)

YES

NO

- | | |
|----------|----------|
| 1. _____ | 5. _____ |
| 2. _____ | 6. _____ |
| 3. _____ | 7. _____ |
| 4. _____ | |